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11 Doe/Klim and Doe/Skywalker

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

ART OF LIVING FOUNDATION, a ) Case No.: CV 10-5022-LHK  
12 California corporation, )  
13 Plaintiff, ) **REQUEST FOR JUDICIAL NOTICE  
14 v. ) OF DEFENDANTS DOE/KLIM AND  
15 DOES 1-10, inclusive, ) DOE/SKYWALKER**  
16 Defendants. )  
17 ) Date: May 12, 2011  
18 ) Time: 1:30 pm  
19 ) Judge: Hon. Lucy H. Koh  
20 ) Courtroom: 4  
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1 Defendants Doe/Klim and Doe/Skywalker, in support of their Motion to Dismiss, Special  
 2 Motion to Strike, and Motion to Quash, respectfully request that the Court take judicial notice  
 3 pursuant to Federal Rule of Evidence 201 of the following:

4 1. That the Official Website of the Office of his Holiness Sri Sri Ravi Shankar, found at  
 5 the following URL: <http://srisriravishankar.org/service-organizations>, a copy of which  
 6 webpage is attached hereto as **Exhibit A**<sup>1</sup> lists the “service organizations “ that he has  
 7 founded as including the Art of Living Foundation, and further describes it as follows:  
 8 *The Art of Living Foundation, a nonprofit educational and humanitarian organization,  
 9 was founded by Sri Sri in 1981. The Foundation has chapters in more than 140  
 10 countries and its sustainable development projects, trauma-relief and self-development  
 11 programs have benefited more than 25 million people around the world. By nurturing  
 12 the spirit of service and compassion in every individual, the Foundation seeks to build  
 13 a global society that is free of stress and violence.*  
 14 2. That the Official Website of the Office of his Holiness Sri Sri Ravi Shankar, (on the  
 15 same URL page <http://srisriravishankar.org/service-organizations>, lists a number of  
 16 other service organizations founded by him, and provides hyperlinks to URLs  
 17 describing such organizations, copies of which are attached hereto, as well as a link  
 18 entitled Media Relations, which contains a listing of “press releases,” the most recent  
 19 of which are attached hereto (others being available at the hyperlink “archives”), as  
 20 well as a hyperlink to a downloadable “press kit,” which is also attached hereto – all of  
 21 which are attached hereto as **Exhibit B**.  
 22 3. Of Plaintiff’s Articles of Incorporation and Amended Bylaws and other documents on  
 23 file with the California Secretary of State, a copy of which is which are attached hereto  
 24 as **Exhibit C-1**, and that the amended bylaws state in Article 2, among other purposes  
 25 of the Corporation is “*to provide funds, materials, volunteers, and/or other resources  
 26 for international relief efforts through various organizations including the AOL  
 27 Foundations worldwide, the AOL International Organization, the International*

28 <sup>1</sup> In some cases the formatting of web pages in Exhibits may differ from their appearance when viewed on a particular  
 29 web browser. This is an artifact of the process of converting to character-readable PDF, and, as well, serves the purpose of  
 30 producing a copy of the text of the webpage in which the text size is more comfortably legible when converted to standard  
 31 8.5 by 11 inch documents for filing in court.

*Association for Human Values, the VVM Organization, and various Trusts established for that purpose; and that Plaintiff's website at <http://us.artofliving.org/content-press-articles> contains numerous press releases concerning Plaintiff, copies of which are attached hereto as **Exhibit C-2**;*

4. That the following articles (and comments thereto)<sup>2</sup> were published on the Leaving the Art of Living Blog (LAOL), all of which are located on the Internet at <http://www.artoflivingfree.blogspot.com> (see specific dates and times for specific articles and comments thereto), and that the statements referred to in the Complaint appeared therein, more specifically as follows:
  - a. The article entitled *The one million dollar question: where do all the millions go?* posted by AoL-Free on December 9, 2009 at 10:33 PM, a true and correct copy of which is attached hereto as ***Exhibit D1***.
  - b. The article entitled *Sudarshan Kriya: FREEING or FRYING the mind?* Posted by AoL-Free on December 23, 2009 at 3:59 PM, as well as the comments thereto, a true and correct copy of which is attached hereto as ***Exhibit D2***.
  - c. The article entitled *The 3 letter unspoken word: S E X*, posted by AoL-Free at 9:40 PM on January 27, 2010, , a true and correct copy of which is attached hereto as ***Exhibit D3***; and that ***Statement D*** appears in the 6<sup>th</sup> paragraph therein [rjn112], and ***Statement E*** in the 5<sup>th</sup> paragraph [rjn111].
  - d. The article entitled *“I said YES. This was my mistake, I agree.”*, listing as its author “JOSH,” posted by AoL-Free on April 12, 2010 at 5:21 PM a true and correct copy of which is attached hereto as ***Exhibit D4***; and that ***Statement P*** appears in a comment posted thereto by Peaceful Warrior on April 19, 2010 at 6:45 PM [rjn132].
  - e. The article entitled *Eaten Up By My Own Mind (part1: Anonymity and*

<sup>2</sup> Blog articles are copied in their entirety, together with comments following in chronological order, in each instance with comments cut off at some chronological point, generally at the point of the last comment cited in the brief. Counsel has highlighted the Statements as well as other matter relevant to the arguments made in the briefs.

*Confrontation*) listing as its author “NICK,” posted by AoL-Free on April 23, 2010 at 3:57 PM. a true and correct copy of which is attached hereto as ***Exhibit D5***; and that ***Statement J*** appears in a comment posted thereto by “Whistleblower” on April 25, 2010 at 11:11 PM [rjn 147-48].

- f. The article entitled *A Full-Timer Night's Dream*, listing as its author "KLIM" posted by AoL-Free on May 24, 2010 at 11:05 PM. a true and correct copy of which is attached hereto as ***Exhibit D6***; and that ***Statement G*** appears in a comment posted thereto by "Anonymous" on May 25, 2010 at 1:33 PM [rjn156-57].
- g. The article entitled *Run, Forrest! Run!!!!*, listing as its author "KLIM," posted by AoL-Free on May 28, 2010 at 12:25 PM. a true and correct copy of which is attached hereto as ***Exhibit D7***; and that ***Statement I*** appears in the 10<sup>th</sup> paragraph therein [rjn167];
- h. The article entitled *Liar, liar, pants on fire!* posted by AoL-Free on May 30, 2010 at 3:57 PM. a true and correct copy of which is attached hereto as ***Exhibit D8***; that ***Statement A*** appears in the 8<sup>rd</sup> paragraph thereto [rjn174], ***Statement B*** in the 4<sup>th</sup> paragraph [rjn174], ***Statement M*** in a comment posted thereto by WhistleBlower on May 30, 2010 at 9:44 PM [rjn181], and ***Statement R*** in a comment posted by Klim & Co. on May 31, 2010 at 7:30 AM [rjn193]; and that the article references and hyperlinks to a story in the Times of India if May 31, 2010 entitled "Sri Sri Ravi Shankar escapes bid on life as man fires at car", a true and correct copy of which is attached hereto as ***Exhibit D8a*** [rjn201].

5. That the following articles and comments were published on the Beyond the Art of Living (BAOL), all of which are located on the Internet at aolfree.wordpress.com (see specific dates and times for specific articles and comments thereto), and that the statements referred to in the Complaint appeared therein, more specifically as follows:

a. The article entitled *AOL illegal financial practices*, listing as its author “aolwhistleblower” posted June 30, 2010. a true and correct copy of which is

1 attached hereto as ***Exhibit E1***; and that ***Statement F*** appears in a comment  
2 posted thereto by “answer@freefall” on May 25, 2010 at 1:33 PM [rjn218],

3 b. The article entitled *The AOL Trance is Broken* listing as its author “Former  
4 AOL Patient” posted July 4, 2010, a true and correct copy of which is attached  
5 hereto as ***Exhibit E2***; and that ***Statement Q*** appears in the 4<sup>th</sup> paragraph therein  
6 [rjn219];

7 c. The article entitled *A Letter of Concern*, listing as its author “Ann Godwin,”  
8 posted on July 29, 2010 a true and correct copy of which is attached hereto as  
9 ***Exhibit E3***.

10 d. The article entitled *An Ex-Teacher’s Reply to Ann*, listing as its author  
11 “Anonymous” posted August 2, 2010. a true and correct copy of which is  
12 attached hereto as ***Exhibit E4***; and that ***Statement H*** appears in the 9<sup>th</sup>  
13 paragraph therein [rjn229];

14 e. The article entitled *No knowledge is worth your freedom!*, listing as its author  
15 “aolwhistleblower” posted August 7, 2010. a true and correct copy of which is  
16 attached hereto as ***Exhibit E5***; and that ***Statement N*** [rjn237] appears in a  
17 comment posted thereto by “Ronin” on August 9, 2010 at 3:46 PM;

18 f. The article entitled *His Holiness Grand Delusion*, listing as its author  
19 “aolwhistleblower” posted August 14, 2010. a true and correct copy of which is  
20 attached hereto as ***Exhibit E6***; and that ***Statement K*** appears in the 6<sup>th</sup>  
21 paragraph therein [rjn239], and that the article hyperlinks (paragraph 3) to “a  
22 recent circular issued by AOL to invite AOL members worldwise to a gathering  
23 in Berlin,” a true and correct copy of which document is attached hereto as  
24 ***Exhibit E6a*** [rjn242];

25 g. The article entitled *JGD, someone is peeing in his pants*, listing as its author  
26 “OMFG” posted August 22, 2010. a true and correct copy of which is attached  
27 hereto as ***Exhibit E7***; and that ***Statement C*** appears in a comment posted  
28 thereto by “WhistleBlower” on August 23, 2010 at 12:16 AM [rjn246], and that

1 the article contains a link (the following URL:

2 <http://artoflivinglifestories.blogspot.com/>,) in the first paragraph to an article  
3 entitled *Kamlesh Barwall Art of Living Experiences* a true and correct copy of  
4 which is attached herein as ***Exh. E7a*** [rjn248];

5 h. The article entitled *DISGRUNTLED SWAMIJI speaks up for his Master,*  
6 *again!*, listing as its author “aolwhistleblower” posted August 25, 2010. a true  
7 and correct copy of which is attached hereto as ***Exhibit E8***; and that ***Statement***  
8 ***L*** (which is the same as ***Statement O***) appears in a comment posted thereto by  
9 “anonymous” on August 27, 2010 at 12:48 PM [rjn289];

10 i. The article entitled *Can We Help to Save The Art of Living*, listing as its author  
11 “The Doctor” posted September 2, 2010. a true and correct copy of which is  
12 attached hereto as ***Exhibit E9***; and that ***Statement S*** appears in a comment  
13 posted thereto by “Peaceful Warrior” on September 4, 2010 at 2:03 PM  
14 [rjn322], and that the version of Statement S appearing in the Complaint is a  
15 slightly abridged version of the actual Statement;

16 j. That the post entitled “Secret AOL Knowledge” attached hereto as ***Exhibit***  
17 ***E10***, was posted at least as early as July 27, 2010 (see earliest comment) to  
18 accompany and explain the posting of the Manuals and the Breath Water Sound  
19 Manual (which latter posts are no longer available on the internet).

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1 [The following “Scorecard” is provided for the assistance of the Court:]

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3 Stmt	4 pg	5 In	6 Exh.	7 Quote	8 Author	9
A	10	1	D8 rjn174	The truth is more disgruntled people should come out to do something about all the illegal activities that occur thru and in his organization, ranging from exploitation, to swindling, to cheating, to physical abuse, to sexual harassment and fondling, etc.	Klim (Aol-Free)	
B	10	5	D8 rjn174	Here is the man who waved off female devotees raped or beaten up by his devotees by telling them it was their fault or that they deserved it since “Violence attracts violence. Your karma.”	Klim (Aol-Free)	
C	10	8	E7 rjn246	And let us not forget that AOL course participants are told their fees go to charity, that AOL teachers work as volunteers, that SriSri [Ravi Shankar] and BhanuDidi are not the beneficiaries of the course fees!! In other words they obtained money from participants on false, deceitful declarations.	Whistleblower	
D	10	12	D3 rjn112	Unfortunately, there are even stories of male teachers raping female students or teachers, and other forms of perversion. The inner circle knew about this.	Klim (AoL-free)	
E	10	15	D3 rjn111	Many teachers, especially senior teachers take advantage of their status. Women fall for them like bees for honey, not knowing they are just being used for sex.	Klim (AoL-free)	
F	10	18	E1 rjn218	The ‘dollar a day’ program was started in the US. The money never went to that cause.	<u>anwer@freefall</u>	
G	10	20	D6 rjn156-57	If you are yourself a rich business man and want to launder your black money or show your competitors that oh I have a Guru then AOL is for you.	Anonymous	
H	10	22	E4 rjn229	He [Ravi Shankar] will use you until he no longer sees you as useful. If you try to leave and he is afraid you know too much about him, he will threaten you, directly, from his own mouth, and through others. You would not be the first, and will not be the last to leave and come under threat, ridicule, and be subject to lies and sick rumors.	Anonymous	

1	I	11	1	D7 rjn167	Many, still scarred by the AoL brain-wash are ashamed of seeking therapy. The physical damages require all sorts of medical supervision that not even doctors understand.	Klim	
2	J	11	4	D5 rjn147-48	There are many cases that companies, individuals give money to AOLorganisation for specific projects, but the money never reaches thoseprojects. It is then left to poor AOL teacher or volunteer to explain to thecompany/donors WHY THE PROJECT IS NOT COMPLETED & SAYWHERE THE MONEY WENT TO! These people are just shameless & havehuge appetite for \$\$\$. AOL volunteers & members, for God's sake wake up& stop giving money to SriSri & his lackeys. None of this money goestoward helping any poor or disadvantaged people. ALL ends up in SriSri &family & Lackey's coffers.	Whistleblower	
3	K	11	13	E6 rjn239	This leaves us with no doubt that SriSri has reached an acute stage of his degenerative illness and is in urgent need of hospitalization before total collapse!	aolwhistleblower	
4	L	11	16	E8 rjn289	And so, some remain anonymous because of verbal and physical threats made, and others because of psychic threats made, yes, even by the precious master himself!	Anonymous	
5	M	11	19	D8 rjn181	And of course as one gets to know RS [Ravi Shankar] more & more onebecomes more & more aware what a violent man RS is. Doing violent actswith total calm & smile on his face doesn't make those acts any less violentnor it reduces the impact on the victims. It just shows his lack ofcompassion & empathy & how calculated he is like a mafia boss. Behindall smiley front of AOL, the organisation is actually rife with violence(mental, emotional, spiritual). Many senior teachers are actually known asbullies & are extremely violent & foul- mouthed. Many members & teachersactually leave the organisation due to existing culture of abuse & violencein the organisation.	Whistleblower	

1	N	12	1	E5 rjn237	Again answer is obvious, the master is a charlatan (is a person practising quackery or some similar confidence trick in order to obtain money) in disguise.	Ronin	
2	O	12	4	E8	[same as I]	Anonymous	
3	P	12	7	D4 rjn132	The money raised for "service projects" get diverted to his personal kitty - all we see is token work.	Peaceful Warrior	
4	Q	12	9	E2 rjn219	From then on, I started observing closely and after many years I am fully convinced that AOL is front-end name for a group of fraudulent NGOs. My lawyer tells me that what they are doing amounts to large-scale organized fraud according to the laws of several countries. The most important 'knowledge point' that AOL practices is Fake It Till You Make It. This cancer has been introduced into many activities by SSRS [Ravi Shankar] himself.	Former AOL Patient	
5	R	12	15	D8 rjn193	He [Ravi Shankar] has so many enemies it could have been bc of a family or an individual he ruined, land he took, money he swindled, someone he abused.	Klim (Klim & Co.)	
6	S	12	18	E9 rjn322	Money from courses does not go into "service projects" it goes into RS's [Ravi Shankar's] bank account. He uses it to start up other businesses— ostensibly <b>[it is to generate employment, but really it's about ]</b> making more money for himself. The mafia also operates this way—they fund legitimate businesses from their ill-gotten wealth.  <b>[Highlighted words were omitted from complaint]</b>	Peaceful Warrior	

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1       6. That the LAOL Blog, in a sidebar which frames the main text of the Blog, links to the  
2       “Exposing the Guruholic” Blog at the following URL:  
3       <http://artoflivingfreefree.blogspot.com/2010/04/truth.html>, an illustrative page of which  
4       is attached in ***Exhibit F***:  
5       7. That the BAOL Blog, in a sidebar that frames the main text of the Blog (*see Exhibit*  
6       *G1a*), links to the following Blogs at the following URLs, as illustrated in the pages  
7       that are attached as *Exhibit G*:  
8       a. ***Exhibit G1*** : “Sad Swami Sadhyojathah’s mean personal attacks” at  
9       <http://www.kashikar.net/2010/08/the-truth-about-the-negative-blogs-by-swami-sadhyojathah/>; and that the letter at this site was also posted at  
10       numerous other URLs, including:  
11       <http://artoflivingshimla.blogspot.com/2010/08/important-information.html>;  
12       <http://www.facebook.com/topic.php?uid=141568279206061&topic=262>;  
13       [http://vinodmathur.blogspot.com/2010\\_08\\_01\\_archive.html](http://vinodmathur.blogspot.com/2010_08_01_archive.html);  
14       <http://amazingdivinity.blogspot.com/>;  
15       <http://dushyantsavadia.net/2010/08/truth-about-negative-blogs-on-aol-swami-sadhyojatha/>;  
16       b. ***Exhibit G2***: “Art of Living Life Stories” at  
17       <http://artoflivinglifestories.blogspot.com/>  
18       c. And that the BAOL Blog also links to “Art of Living Free Free” at  
19       <http://artoflivingfreefree.blogspot.com/> (see Exhibit F)  
20       8. That the following URLs contain information about Sudarshan Kriya, copies of which  
21       are attached hereto as ***Exhibit H***:  
22       a. [http://www.ehow.com/way\\_5414823\\_sudarshan-kriya-breathing-technique.html](http://www.ehow.com/way_5414823_sudarshan-kriya-breathing-technique.html)  
23       b. <http://www.webanswers.com/travel/sudarshan-kriya-how-to-do-1b619a>  
24       c. <http://hubpages.com/hub/Sudarshan-Kriya-The-Healing-Breath-Technique>  
25       9. That at the following URL: [www.aolresearch.org/published\\_research.html](http://www.aolresearch.org/published_research.html), a summary

1 of AOL's "scientific" research, with links to the underlying studies (summary attached)  
2 (*Exhibit II*), and that among the studies there posted are the studies by Descilo et al  
3 (*Exhibit I2*) and by Kjellgren at all (*Exhibit I3*), at the following URLs;  
4 [http://www.aolresearch.org/pdf/Descilo\\_et\\_al\\_2009.pdf](http://www.aolresearch.org/pdf/Descilo_et_al_2009.pdf) and  
5 <http://www.aolresearch.org/pdf/1472-6882-7-43.pdf>; all of which are attached hereto as  
6 ***Exhibit I***

7 10. That the AOL student-teacher forms attached hereto as ***Exhibit J*** can be found on the  
8 internet at [www.artoflivinglondon.org/SriSri\\_Yoga\\_Form\\_Caterham2009.pdf](http://www.artoflivinglondon.org/SriSri_Yoga_Form_Caterham2009.pdf);  
9 [en.artofliving.ch/IMG/pdf\\_PartI-2010-Application\\_form-Lausanne.pdf](http://en.artofliving.ch/IMG/pdf_PartI-2010-Application_form-Lausanne.pdf); and  
10 <http://artoflivinghk.wordpress.com/courses/pti/>

11 11. That AOL claims to have given free "Breath Water Sound" Courses to over one  
12 million people in India for free, as stated on its Michigan chapter's website at  
13 <http://www.umich.edu/~aolum/breathAndSound.htm>, a copy of which is attached hereto  
14 as ***Exhibit K***.

15  
16 Dated: February 23, 2011

17 \_\_\_\_\_/s/\_\_\_\_\_  
18 Joshua Koltun  
19 Attorney for Defendants  
20 Doe/Klim and Doe/Skywalker  
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